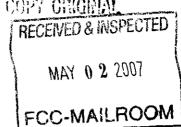


DONGREE THEE COPY CANCELLAL

2200 IDS Center 80 South 8th Street
Minneapolis MN 55402-2157 tel 612.977.8400 fax 612.977.8650



April 27, 2007

Mark J. Ayotte 612.977.8240 mayotte@briggs.com

VIA E-MAIL AND U.S. MAIL

Karen Majcher Vice President – High Cost & Low Income Division Universal Service Administrative Company 444 Hoes Lane RRC 4A1060 Piscataway, NJ 08854 hcfilinrs(iihcli.universalservice.org

Karen Majcher Vice President – High Cost & Low Income Division Universal Service Administrative Company 2000 L Street, N.W., Suite 200 Washington, D.C. 20036

VIA U.S. MAIL

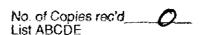
Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 – 112th Street S.W. Washington, D.C. 20554

Re: CC Docket 96-45, Federal State Joint Board on Universal Service RCC MINNESOTA, INC. SAC 369004

Dear Ms. Majcher and Ms. Dortch

By Order dated April 25, 2007, the Minnesota Public Utilities Commission ("MPUC") issued an Order designating RCC Minnesota, Inc. ("RCC") as a competitive eligible telecommunications carrier ("ETC") in certain rural and non-rural telephone company service areas in the State of Minnesota.' In the same Order, the MPUC reaffirmed that RCC has been designated as an ETC in certain other wire centers for which it has not been receiving federal universal service support. A copy of the MPUC's April 25, 2007 Order is enclosed for your reference. For your convenience, a list of the newly designated wire centers where the MPUC has granted ETC designation to RCC is enclosed as Exhibit A. Similarly, a list of the wire centers where the MPUC has reaffirmed the designation of RCC is enclosed as Exhibit B.²

² The MPUC's Order identifies the scope of the ETC designation with reference to Exhibits **A** and B to RCC's Petition. The enclosed Exhibits are taken directly from RCC's Petition.



¹ The MPUC had previously designated RCC as a competitive ETC in other rural and non-rural telephone company areas in Minnesota by Order dated July 31, 2003 in MPUC Docket No. PT-6182,6181/M-02-1503.

BRIGGS AND MORGAN

April 27,2007 Page 2

Please update your records to reflect that RCC Minnesota, Inc. has been designated as a competitive ETC in additional areas of Minnesota as described in the MPUC's April 25, 2007 Order.

If you should have any questions or concerns regarding the enclosed, please do not hesitate to contact me.

Sincerely yours,

Mark J. Ayotte

MJA/sjc

Enclosures

cc: Michael Spead, USAC (w/enclosures) - via e-mail, mspead@universalservice.org

Steve Otto, RCC USF Program Manager (w/enclosures)

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISS

LeRoy Koppendrayer Marshall Johnson Phyllis Reha Thomas Pugh Chair MAY 0 2 2007
Commissioner
Commissioner
Commissioner

Mark J. Ayotte Briggs and Morgan 2200 IDS Center 80 South 8th Street Minneapolis, MN 55402 SERVICE DATE: APR 2 5 2007

DOCKET NO. PT-6182/M-07-243

In the Matter of the Petition of RCC Minnesota, Inc. for Designation as an Eligible Telecommunications Carrier

The above entitled matter has been considered by the Commission and the following disposition made:

Approved RCC's petition to expand the scope of its ETC designation to include the wire centers listed in Exhibit A of RCC's petition and required RCC to submit, within 30 days of this Order, an updated informational tariff to reflect its newly expanded service area;

Reaffirmed that RCC has been designated as an ETC in the wire centers listed in Exhibit B of RCC's petition.

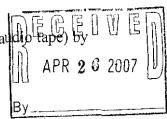
The Commission agrees with and adopts the recommendations of the Department of Commerce which are attached and hereby incorporated in the Order.

BY ORDER OF THE COMMISSION

Burl W. Haar Executive Secretary

(S E A L)

This document can be made available in alternative formats (i.e., large print or a calling (651) 201-2202 (voice), or 1-800-627-3529 (TTY relay service).





March 22, 2007

Burl W. Haar Executive Secretary Minnesota Public Utilities Commission 121 7th Place East, Suite 350 St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce

Docket No. PT6182/M-07-243

Dear Dr. Haar:

Attached are the comments of the Minnesota Department of Commerce in the following matter:

The Petition of RCC Minnesota, Inc. For Designation as an Eligible Telecommunications Carrier.

The petition was filed on February 20,2006 by:

Mark J. Ayotte Briggs and Morgan 2200 **IDS** Center 80 South 8th Street Minneapolis, MN 55402

The Department recommends **approval of the petition with conditions**, and is available for any questions the Commission may have.

Sincerely,

/s/ KATHERINE DOHERTY Rates Analyst

KD/sm Attachment

> Market Assurance: 1.800.657.3602 Energy Information: 1.800.657.3710 www.commerce.state.mn.us

Licensing: 1.800.657.3978 Unclaimed Property: 1.800.925.5668 An Equal Opportunity Employer



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE

DOCKET NO. PT6182/M-07-243

I. PROCEDURALBACKGROUND

On February 21, 2007, RCC Minnesota, Inc. (RCC) submitted a petition requesting that the scope of its Eligible Telecommunications Carrier (ETC) designation in Minnesota be expanded to include the Minnesota wire centers listed in Exhibit A of its petition.'

RCC was previously designated as an ETC throughout 33 counties in central and northern Minnesota (listed in Attachment C) by Minnesota Public Utilities Commission (Commission) order dated July 31,2003, in Docket No. PT6182,6181/M-02-1503. As a result of an agreement with AllTel Communications (Alltel), RCC has agreed to acquire certain licenses and substantially all of the assets of WWC Holding Co. (Western Wireless) for a portion of the Minnesota areas in which Western Wireless was previously designated as an ETC by the Commission.

RCC states that the transferred assets include "all network assets and other equipment used to provide service, including transport facilities, test equipment, transmitters and receivers, antennae, generators, towers, towers, and network facilities, all owned and leased real property to support the network assets, subscriber contracts customer and billing files, network plans, inventory equipment, furniture and other personal property." As a result of the transaction, Western Wireless will no longer serve these areas. (The Department of Commerce [Department] notes that Western Wireless is obligated as an ETC to serve the areas in which it is designated, and should petition the Commission to relinquish its ETC status in those areas in which it is no longer licensed. If Westem Wireless does not do so, the Commission may wish to revoke Western Wireless' ETC designation in the affected areas.)

A copy of RCC's Exhibit A is included as Attachment A to the Department's comments

Analyst assigned: Katherine Doherty

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In addition to its request to expand the scope of its ETC designation, RCC requests that the Commission reaffirm certain of the wire centers in which it was previously designated as an ETC (listed in Exhibit B of its petition'), due to a "dispute with the [Universal Service Administrative Company] USAC over the status of redefinition of the service area requirement in these areas."

II. HISTORICAL BACKGROUND

THE COMMISSION'S PROCESS FOR REVIEW OF ETC APPLICATIONS

The Carrier's Intent and Capability

In recent cases in which the Commission has considered ETC applications, the Commission has undertaken a critical analysis in order to determine whether the applicant has successfully demonstrated its capability and commitment to provide service throughout its designated service area to all customers who make a reasonable request for service. (Thus far, the Commission has not made a specific determination as to what constitutes a "reasonable" request for service, but has handled such issues on a case-by-case basis as they come before the Commission.)

In making its determination, the Commission has typically reviewed the following:

- A list and description of the facilities used to provide service throughout the service area for which the applicant seeks support.
- A description of how the applicant will fulfill its obligation to provide service, upon a reasonable request from a customer, in any portion of its requested service area that is currently unserved including specific steps, and associated costs, the applicant commits to take to serve customers who otherwise may not receive quality, affordable service.
- A detailed description of at least one "basic" affordable universal service offering containing all of the supported services.
- A formal plan for advertising the offering and the availability of Lifeline and Linkup and the basic universal service offering throughout its proposed service area.
- A service quality plan, including commitments and/or disclosures regarding customer service and dispute resolution policies; network maintenance policies; procedures for resolving service interruptions and any associated customer remedies: and billing, payment, deposit, and disconnection policies.

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² See Attachment B

³ RCC Petition. page 6

Analyst assigned: Katherine Doherty

Page 3

- An informational tariff or customer service agreement that includes the following:
 - All rates associated with the universal service offering, including the cost of all equipment and installation charges and all other recurring and non-recurring charges.
 - Other services which may be added to the universal service offering.
 - o **All** terms and conditions of service associated with its universal service offering.

Public Interes

In addition to the above, the Commission has heretofore required carriers to file sufficient information prior to the start of the 180 day review period, such that the Commission may determine not only the carrier's intent and capability of providing the nine supported services throughout its proposed service area, but information which allows the Commission to fulfill its obligation to critically evaluate public interest issues. The Commission has considered and evaluated such public interest factors as consumer choice, the advantages and disadvantages of particular service offerings, affordability of rates, service quality, and reliability of service. Prior to approving a carrier's request to redefine the service of a rural incumbent exchange carrier, the Commission has examined population density (as a proxy for cost) and/or modeled cost analyses to ensure that "cream skimming," either intentional or non-intentional, does not occur.

RECENT FEDERAL COMMUNICATIONS COMMISSION AND MINNESOTA PUBLIC UTILITIES COMMISSION ORDERS

In its March 11,2005 Report and Order In the Matter of the Federal-State Joint Board on Universal Service, the Federal Communications Commission (FCC), while clarifying that state commissions would continue to maintain the flexibility necessary to impose additional eligibility requirements on ETC applicants if they so choose, adopted additional "mandatory requirements for ETC designation proceedings in which the [Federal Communications] Commission acts pursuant to section 214(e)(6) of the Communications Act of 1934, as amended."

The FCC stated its intent to require an ETC applicant (in a proceeding before the FCC) to fulfill the following requirements in order to satisfy its burden of proof necessary to obtain ETC designation:

 Commit to providing service throughout its proposed service area upon reasonable request and provide a five-year plan demonstrating how high-cost universal service support will be used to improve its coverage, service quality, or capacity in every wire center in which it seeks designation and in which it expects to receive universal service support.

Analyst assigned: Katherine Doherty

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- Demonstrate its ability to remain functional in emergency situations.
- Demonstrate that it will satisfy consumer protection and service quality standards.
- Offer local usage plans comparable to those offered by the incumbent lc 1 exchange carrier ([I]LEC) in the areas for which it seeks designation; and
- Acknowledge that it may be required to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to section 214(e)(4) of the Act.

On October 31, 2005, in Docket P999/M-05-1169, the Commission adopted, in addition to its existing template for review of ETC applications, the additional requirements proposed by the FCC, with the following modifications:

- **As** part of its application to be designated as an ETC, an applicant may choose to file a two-year plan described in \$54.202(a)(1)(ii) rather than a five year plan; and
- Carriers may choose to file information on a service area basis, instead of on a wire center basis.

III. STATEMENT OF ISSUES

- 1. Whether RCC has demonstrated the intent and capability of providing and advertising the services required in 47 CFR Section 54.101(a) for the purpose of establishing eligibility for federal universal service funds in its requested service area.
- 2. Whether designation of RCC as an ETC in RCC's proposed service area is in the public interest.

IV. DISCUSSION OF LAW

47 U.S.C Section 254(e) provides that "only an eligible telecommunications carrier designated under 214(e) shall be eligible to receive specific Federal universal support."

47 U.S.C. Section 214(e)(1) states:

A common carrier designated as an eligible telecommunications carrier ...shall, throughout the service area for which the designation is received—(A) offer the services that are supported

Docket No. PT6182/M-07-243 Analyst assigned: Katherine Doherty

Page 5

by Federal universal service support mechanisms under section 254(e) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier) and (B) advertise the supported services and the charges therefore using media of general distribution.

47 C.F.R. Section 54.101(a) outlines the federally supported services or functionalities supported by federal universal service support mechanisms:

- Voice grade access to the public switched network.
- Local usage.
- Dual tone multi-frequency signaling or its functional equivalent.
- Single-party service or its functional equivalent.
- Access to emergency services. "Access to emergency services' includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations.
- Access to operator services.
- Access to interexchange service.
- Access to directory assistance.
- Toll limitation for qualifying low-income consumers.

47 C.F.R. \$54.202 outlines the FCC's recently adopted requirements for FCC designation of ETCs.

V. ANALYSIS

RCC'S INTENT AND CAPABILITY OF PROVIDING SERVICE UPON REASONABLE CUSTOMER REQUEST THROUGHOUT ITS PROPOSED SERVICE AREA

RCC's Facilities

RCC provides the nine supported services using some or all of its own facilities throughout its currently designated service area. RCC states that it is "fully capable of and willing to provide service in the Proposed Designated Service Areas consistent with the obligations on an ETC." RCC has provided a listing and description of the network facilities to be used to provide the supported services. RCC notes that on an interim basis it will receive switching services from Alltel until such time as the acquired cell sites can be fully interconnected with RCC's existing switching facilities." RCC has provided a map with detailed information regarding its signal coverage in its proposed service area.

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⁴ RCC Petition, page 15.

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RCC's Basic Universal Service Offering

RCC will provide a basic universal service offering (BUUSO) with unlimited local usage that includes the nine supported services. Upon receiving ETC designation, RCC will make its BUUSO plan available to customers within its expanded service pursuant to the same terms and conditions in its customer service agreement and BUUSO informational tariff, approved by the Commission in Docket No. PT6182,6181/M-02-1503.

RCC commits to take the following steps to provide service in response to a reasonable request from a customer within its proposed service area:

- Provide service on a timely basis to requesting customers within its Proposed Designated Service Areas where its network already serves the potential customer's premises; and
- Provide service within a reasonable period of time, if the potential customer's 2. premises is locate within RCC's Proposed Designated Service Areas, but outside its existing network coverage, if service can be provided at reasonable cost by:
 - Modifying or replacing the requesting customer's equipment; a.
 - Deploying a roof-mounted antenna or other equipment; b.
 - Adjusting the nearest cell tower; c.
 - Adjusting network or customer facilities; d.
 - Reselling service from another carrier's facilities to provide service; or e.
 - Employing, leasing, or constructing an additional cell site, cell extender, f. repeater or other similar equipment.6

Advertising. Plan

RCC has provided information regarding its plans to advertise the availability of Lifeline, Linkup, and the nine supported services throughout its proposed service area.'

2-year Plan for the Use of Universal Service Support

RCC has provided a detailed plan⁸ for the use of universal service support, including specific service coverage, service quality, emergency service, and capacity improvements. In addition, RCC has provided information regarding operating expenses associated with the projected improvements. The Department notes that in future years, as a designated ETC, RCC will continue to be required to file on an annual basis, pursuant to the Commission's Order in Docket No. P999/M-05-741, two year service improvement plans and reports on its progress toward the fulfillment of those plans.

⁶ RCC petition, pages 17-18.

RCC Petition, Exhibit E.
 RCC Petition, Trade Secret Exhibit F

Docket No. PT6182/M-07-243 Analyst assigned: Katherine Doherty

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bility to Remain Functional in Emergency Situations

RCC has included sufficient information in its petition to demonstrate that it has a reasonable amount of backup power without an external power source.9

Acknowledgement Regarding Eaual Access

On page 25 of its petition, RCC acknowledges that it may be required to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the designated areas.

The Department believes that RCC has adequately demonstrated the intent and capability of providing the nine supported services throughout its service area.

PUBLIC INTEREST

The Commission has found, in general, that the designation of qualifying competitive ETC's is in the public interest and comports with Minnesota's telecommunications goals of supporting universal service, maintaining just and reasonable rates, promoting customer choice, encouraging fair and reasonable competition for local exchange telephone service in a competitively neutral manner, maintaining or improving quality of service, and promoting customer choice.

In addition to the level of demonstrated intent by the petitioner to invest in network infrastructure in Minnesota and the general public interest benefits of competition, the Commission has chosen, in previous dockets designating ETCs in Minnesota, to consider affordability and service quality as part of its public interest analysis.

Affordability

Although the Commission has not specifically defined the term "affordable" in its previous ETC designations, each Minnesota CLEC and wireless carrier that has been granted designation as an ETC has offered at least one "affordable" choice to its customers. RCC's basic universal service with unlimited local usage is offered at \$14.99 monthly and can be installed for a non-recurring charge of \$30.00. RCC commits to lease the customer premises equipment necessary for the use of its BUUSO at a rate of \$5.00 monthly. In designating RCC as an ETC in Docket No. PT6182,6181/M-02-1503, the Commission found this rate acceptable.

RCC has met the expectation that it offer at least one basic "affordable service," as well as the newly adopted requirement that it offer local usage plans comparable to those offered by the incumbent local exchange carrier ([]]LEC) in the areas for which it seeks designation.

⁹ RCC **petition** pages 20-22

Analyst assigned: Katherine Doherty

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Service Quality

RCC has included specific provisions in its Minnesota BUUSO informational tariff and customer service agreement (which have been deemed acceptable by the Commission) with regard to:

- Billing Practices
- Appropriate handling of customer complaints and billing disputes
- Disconnection, deposit, and notice requirements

In addition, RCC notes that it has adopted the wireless "Consumer Code which sets forth certain principles, disclosures, and practices for the provision of wireless services." 10

Effect on the Federal Universal Service Fund

'It is important to note that the designation of RCC as a federal ETC will have little or no effect on the size of the federal universal service fund at this time. As RCC points out, RCC's designation in this docket will essentially become a substitute for the federal universal service support which WWC was receiving for customers served in essentially the same areas.

PROPOSED SERVICE AREA

RCC's Proposed Expanded Service Area

Exhibit A of RCC'S petition lists all of the non-rural wire centers, rural telephone company study areas that RCC proposes to serve in their entirety, and previously redefined rural telephone company wire center for which RCC is seeking ETC designation. No further redefinition is necessary.

However, because RCC seeks to serve only certain wire centers within the study areas of some rural JLEC, it has provided, with its application, a population density analysis (which the FCC has deemed a reasonable proxy for a cost analysis) of the rural LEC service areas in which it requests redefinition at the wire center level.

In previous dockets, when evaluating a competitive ETC's proposed service area, the Commission has considered the potential for "cream skimming" effects that may occur when a competitive carrier, intentionally or unintentionally, proposes to serve only the low cost, high revenue areas of a rural carrier's study areas to the exclusion of high cost areas.

RCC does not appear to be deliberately cream skimming, having based its request for redefinition upon the area in which it is licensed by the FCC to serve. The Department finds no evidence that the population densities of the areas which RCC proposes to serve are significantly higher than (and hence, presumably lower cost) than the population densities of the areas which RCC proposes to exclude from its expanded service area.

¹⁰ RCC petition, page 23

Analyst assigned: Katherine Doherty

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The Department notes also that, to the extent that rural ILECs wish to further disaggregate or alter the way in which they have targeted the available universal service support with their service areas, they may petition the Commission to do so.

RCC's Request for Reaffirmation of its Previously Designated ETC Service Area

Exhibit B of the petition lists the rural telephone company wire centers for which RCC is requesting reaffirmation of its ETC designation.

RCC seeks reaffirmation of RCC's previous ETC designation in certain wire centers in the redefined service areas of Citizens, Federated Telephone, Melrose, Mid-State and Embarq due to a dispute with **USAC** over the redefinition status of those areas.

RCC and USAC disagree as to whether each of the aforementioned ILEC study areas was redefined, *in its entirety*, at the wire center level in Docket No PT6153/AM-02-686, ¹¹ or whether *only the portion* of each ILEC's study area for which Midwest Wireless sought ETC designation in that docket had been redefined. Consequently, RCC requests that the Commission reaffirm RCC's designation as an ETC in the affected wire centers for these ILECs.

In Docket No PT6458/M-05-1122, ¹² the Commission issued an Order on June 16, 2006, stating that "[t]he entire service areas of Citizens Telecommunications of Minnesota, Inc., Federated Telephone Cooperative, Loretel Systems, Inc. Melrose Telephone Company, Mid-State Telephone Co, Sprint-Minnesota [n/k/a Embarq], and Twin Valley-Ulen Telephone Co. have been redefined into their component wire centers."

The Department believes that the Commission's Order is clear with respect to the redefinition of the disputed ILEC service areas. However, in the interest of further clarity and certainty for RCC, the Department recommends that, in addition to approving RCC's proposed expanded ETC-designated service area, the Commission reaffirm that RCC has been designated as an ETC in the *wire centers* listed in Exhibit B of RCC's petition.

VI. COMMISSION ALTERNATIVES

A. With regard to RCC's designation as an ETC in its proposed expanded service area:

1. Find that RCC has made a credible showing of its capability and intent to provide and advertise an affordable, quality offering, including the nine federally supported services, throughout its proposed service area, and that its designation is in the

In the Matter of the Petition of Midwest Wireless Communications.LLC for Designation as an Eligible Telecommunications Carrier Under 47 USC §214(e)(2).

¹² In the Matter of American Cellular Corporation's Petition for Designation **as** an Eligible Telecommunications Carrier and Redefinition **of**Rural Telephone Company Service Area Requirement, Docket No. PT6458/M-05-1122, Order Clarifying Prior Orders, June 16. 2006, page 5.

Analyst assigned: Katherine Doherty

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public interest. Approve RCC's petition to expand its ETC-designated service area to include the wire centers listed in Exhibit A of RCC's Petition. Require RCC to submit, within 30 days of the Commission's Order, an updated Informational tariff and customer service agreement to reflect its newly expanded service area.

- 2. Find that RCC has not provided sufficient evidence of its capability and intent to provide and advertise an affordable, quality offering, including the nine federally supported services, throughout its proposed service area, and/or that its designation is not in the public interest. Deny RCC's petition for designation as an ETC in its proposed expanded service area.
- 3. Approve the petition with other conditions or requirements that the Commission deems appropriate.
- B. With regard to the reaffirmation of RCC's prior ETC designation in certain wire centers:
 - 1. Affirm that RCC has been designated as an ETC in the wire centers listed in Exhibit B
 - 2. Do not affirm that RCC has been designated as an ETC in the wire centers listed in Exhibit B of RCC's petition.

VII. RECOMMENDATION

The Department recommends Alternative AI and B1

The Commission should find that RCC has made a credible showing of its capability and intent to provide and advertise an affordable, quality offering, including the nine federally supported services, throughout its proposed service area, and that its designation is in the public interest. Approve RCC's petition to expand the scope of its ETC designation to include the wire centers listed in Exhibit A of RCC's petition, and require RCC to submit, within 30 days of the Commission's Order, an updated informational tariff and customer service agreement to reflect its newly expanded service area.

In addition, the Commission should reaffirm that RCC has been designated as an ETC in the wire *centers* listed in Exhibit B of RCC's petition.

/sm

EXHIBIT A

RECEIVED & INSPECTED

Non-Rural Wire Centers, Rural Telephone Company Study Areas and Previously

Redefined Rural Telephone Company Wire Centers for Which RCC Meeting 2007

Designation

I. Non-Rural Telephone Company

FCC-MAILROOM

Non-Rural Telephone Company	Study Area/ Wire Center	CLLI	WWC Designation
OWEST CORPORATION	ALBERT LEA	ALLEMNAL	WWCETC Order IV
(SAC 365 142)	FARIBAULT	FRBLMNFA	WWC ETC Order IV
	GLENVILLE	GLVLMNGL	WWC ETC Order IV
	GAYLORD	GYLRMNGA	WWCETC Order I
	JACKSON	JCSNMNJA	WWCETC Order I
	LE SUEUR	LESRMNLS	WWC ETC Order IV
	LITCHFIELD	LTFDMNLI	WWCETC Order I
	LUVERNE	LVRNMNLU	WWCETC Order I
	MARSHALL	MRSHMNMA	WWCETC Order I
	MONTEVIDEO	MTVDMNMO	WWC ETC Order I
	NICOLLET	NCLTMNNC	WWC ETC Order I
	BIRD ISLAND	OLIVMNOL	WWCETC Order I
	OLIVIA	OLIVMNOL	WWCETC Order I
	OWATONNA	OWTNMNOW	WWCETC Order IV
	PIPESTONE	PPSTMNPI	WWC ETC Order I
	MORTON	RDFLMNRA	WWC ETC Order I
	REDWOOD FLS	RDFLMNRA	WWC ETC Order I
	NEW SWEDEN	STPRMNSP	WWCETC Order I
	SAINT PETER	STPRMNSP	WWCETC Order IV
	TRACY	TRACMNTR	WWCETC Order I
	WASECA	WASCMNWA	WWC ETC Order IC
	WILLMAR	WLMRMNWI	WWCETC Order I
	WINDOM	WNDMMNWI	WWCETC Order I

II. Rural Telephone Company Study Areas and Previously Redefined Rural Telephone Company Wire Centers

Rural Telephone Company	Study Area/ Wire Center	CLLI Code	WWC Designation
BLUE EARTH VALLEY	BLUE EARTH	BLERMNXB	WWC ETC Order IV
TELEPHONE CO	ELMORE	ELMRMNXE	
(SAC 361358)	GUCKEEN	GCKNMNXG	
	HUNTLEY	HNTLMNXH	
	WELLS	WLLSMNXW	
	WINNEBAGO	WNNBMNXW	
	(Full Study Area)		

Rural Telephone Company	Study Area/ Wire Center	CLLI Code	WWC Designation
CANNON VALLEY	BRICELYN	BRCLMNXB	WWC ETC Order IV
TELECOM,INC.	FREEBORN	FRBRMNXF	
(SAC 361440)	FROST	FRSTMNXF	
(5/10/501410)	MORRISTOWN	MRTWMNXM	
	(Full Study Area)		
CENTURYTEL OF	BREWSTER	BRWSMNXA	WWCETC Order III
MINNESOTA, INC.*	LUVERNE	BVCKMNXA	WWC ETC Order IV
(SAC 361445)	DUNDEE	DUNDMNXA	WWCETC Order III
	FAIRFAX	FRFXMNXA	WWCETC Order III
	FULDA	FULDMNXA	WWCETC Order III
	GIBBON	GBBNMNXA	WWCETC Order III
	HERON LAKE	HRLKMNXA	WWCETC Order III
	JEFFERS	JFRSMNXA	WWCETC Order III
	LAFAYETTE	LFYTMNXA	WWC ETC Order III
	LAMBERTON	LMTNMNXA	WWCETC Order III
	MINNEOTA	MNETMNXA	WWCETC Order III
	ROUND LAKE	RNLKMNXA	WWC ETC Order III
	RENVILLE	RNVLMNXA	WWC ETC Order III
	RUSHMORE	RSHMMNXA	WWCETC Order III
	WILMONT	WLMTMNXA	WWC ETC Order III
	WESTBROOK	WSBKMNXA	WWC ETC Order III
CHRISTENSEN	MADELIA	MADLMNXM	WWCETC Order III
COMMUNICATIONS	(Full Study Area)		
COMPANY – MN			
(SAC 361425)			
CITIZENS TELECOM CO MN	ARCO	ARCOMNXA	WWC ETC Order I
FRONTIER CITIZEN\$	ATWATER	ATWRMNXA	WWCETC Order I
COM-MN-LAKES**	BOYD	BOYDMNXB	WWCETC Order I
(SAC 361123)	BUTTERFLD	BTFDMNXB	WWC ETC Order I
	CLARKFIELD	CLFDMNXC	WWCETC Order I
	CLARKS GRV	CLGVMNXC	WWC ETC Order IV
	COMFREY	CMFRMNXC	WWCETC Order I
	COSMOS	CSMSMNXC	WWC ETC Order I
	COTTONWOOD	CTWDMNXC	WWCETC Order I
	DELFT	DLFTMNXD	WWC ETC Order I
	ELLENDALE	ELDLMNXA	WWCETC Order IV
	GHENT	GHNTMNXG	WWCETC Order I
	HECTOR	HCTRMNXA	WWCETC Order IV
	HANLEY FLS	"FLMNXH	WWCETC Order I
	HOLLANDALE	HODLMNXH	WWC ETC Order IV
	HARDWICK	HRWKMNXH	WWC ETC Order I
	HAZEL RUN	HZRNMNXA	WWCETC Order I
	WEST JASPER	JSPRMNXJ	WWC ETC Order I
	KANDIYOHI	KDYHMNXA	WWC ETC Order I

Rural Telephone Company	Study Area/ Wire Center	%Cbl.l.Code	WWC Designation
	LAKE LILLIAN	LKLLMNXL	WWC ETC Order I
	LYND	LYNDMNXL	WWC ETC Order I
	MOUNTAIN LAKE	MTLKMNXM	WWC ETC Order I
	ODIN	ODINMNXO	WWC ETC Order I
	PRINSBURG	PRBGMNXP	WWC ETC OrderI
	RAYMOND	RYMNMNXA	WWC ETC Order I
	SVEA	SVEAMNXS	WWCETC Order I
	TYLER	TYLRMNXT	WWC ETC Order I
CITIZENS TELECOM CO	ALDEN	ALDNMNXB	WWCETC Order III
MN-FRONTIER CITIZENS	KIESTER	KSTRMNXL	WWC ETC Order III
COM-MN – SOUTH*	BIGELOW	BGLWMNXB	WWCETC Order III
(SAC 367123)			
CLARA CITY TELEPHONE	CLARA CITY	CLCYMNXB	WWC ETC Order I
EXCHANGE CO.	MAYNARD	MYNRMNXM	
(SAC 361370)	(Full Study Area)		
CLEMENTS TELEPHONE	CLEMENTS	CLEMMNXC	WWCETC Order I
CO.	(Full Study Area)		
(SAC 361372)			
DELAVAN TELEPHONE CO.	DELAVAN	DLVNMNXD	WWC ETC Order IV
(SAC 361380)	(Full Study Area)	DLAMMAD	WWCEIC Order IV
(SAC 301360)	(Full Study Area)		
DUNNELL TELEPHONE CO.,	DUNNELL	DNNLMNXD	WWC ETC Order III
INC.	(Full Study Area)		
(SAC 361381)			
EASTON TELEPHONE CO.	EASTON	ESTNMNXE	WWC ETC Order IV
(SAC 361384)	(Full Study Area)		
EMBARQ MINNESOTA*	BUFFALO LAKE	BFLKMNXB	WWC ETC Order III
(SAC 361456)	BROWNTON	BRTNMNXB	WWC ETC Order III
(2110 001 100)	DASSEL	DSSLMNXD	WWC ETC Order III
	GLENCOE	GLCOMNXG	WWC ETC Order III
	GRANITE FLS	GRFLMNXG	WWC ETC Order III
	GROVE CITY	GVCYMNXG	WWCETC Order III
	LESTER PRAIRIE	LSPRMNXL	WWC ETC Order III
	NEW RICHLAND	NWLDMNXN	WWC ETC Order III
	SILVERLAKE	SLLKMNXS	WWC ETC Order III
	ST JAMES	STJMMNXS	WWCETC Order III
	STEWART	STWTMNXS	WWCETC Order III
	WALDORF	WDRFMNXW	WWCETC Order III

Rural Telephone Company	Study Area/ Wire Center	: CLLI Code	WWC Designation
FARMERS MUTUAL	BELLINGHAM	BLHMMNXB	WWC ETC Order I
TELEPHONE CO.	CERROGORDO	CRGRMNXC	
(SAC 361389)	W MARIETTA	 MRTTMNXM	
,	(Full Study Area)		
FEDERATED TELEPHONE	BIG BEND	BBCYMNXB	WWC ETC Order III
COOPERATIVE	MILAN	MILNMNXM	WWC ETC Order III
(SAC 361390)	(Full Study Area		
	when combined with		
	existing RCC		
ED ONDER D	designation)	ADDAR OBYA	HUILO ETC O 1 M
FRONTIER COMMUNICATIONS OF	ADRIAN	ADRNMNXA	WWC ETC Order II
MINNESOTA, INC.*	ARLINGTON AVOCA	ARTNMNXA AVOCMNXA	
(SAC 361367)	BALATON	BLATMNXB	
(5.10.001507)	CHANDLER	CHNDMNXC	
	CANBY	CNBYMNXC	
	CURRIE	CURRMNXC	
	CEYLON	CYLNMNXC	
	DAWSON	DWSNMNXD	
	EAST CHAIN	ECHNMNXE	
	EDGERTON	EGTNMNXE	
	ELLSWORTH	ELWOMNXE	
	ELYSIAN	ELYSMNXE	
	FAIRMONT	FAMTMNXF	
	GREEN ISLE	GRISMNXG	
	HENDERSON	HNSNMNXH	
	IONA	IONAMNXI	
	IVANHOE	IVNHMNXI	+
	JANESVILLE	JNVLMNXJ	
	KILKENNY	KLKNMNXK	
	LE CENTER LEOTA	LECTMNXL LEOTMNXL	
	LAKEFIELD	LKFDMNXL	
	LAKE WILSON	LKWLMNXL	
	LEWISVILLE	LWVLMNXL	
	MADISON	MDSNMNXM	
	MONTGOMERY	MTGMMNXM	
	NORTHROP	NKOPMNXN	
	OKABENA	OKBNMNXO	
	PORTER	PTERMNXP	
	SHERBURN	SHBNMNXS	
	SLAYTON	SLTNMNXS	
	ST LEO	STLEMNXS	
	TRUMAN	TRMNMNXT	
	TRIMONT	TRMTMNXT	
	WELCOME	WLCMMNXW	

Rural Telephone Company	Study Area/ Wire Center	©ELI Code	WWC Designation
	WORTHINGTON WATERVILLE	WOTNMNXW WTVLMNXW	
GRANADA TELEPHONE CO. (SAC 361399)	GRANADA (Full Study Area)	GRADMNXG	WWCETC Order I
HILLS TELEPHONE CO., INC. (SAC 361405)	HILLS STEEN (Full Study Area)	HILSMNXH STENMNXS	WWC ETC Order I
HUTCHINSON TELEPHONE CO. (SAC 361409)	HUTCHINSON (Full Study Area)	HTSNMNXH	WWC ETC Order J
INTERSTATE TELECOM. COOP., INC. – MINNESOTA (SAC 361654)	LAKE BENTON HENDRICKS (Full Study Area)	LKBNMNXL HNDRMNXH	WWC ETC Order I
LISMORE COOPERATIVE TELEPHONE CO. (SAC 361419)	LISMORE (Full Study Area)	LSMRMNXL	WWC ETC Order I
LONSDALE TELEPHONE CO., INC. (SAC 361422)	LONSDALE (Full Study Area)	LNDLMNXB	WWC ETC Order IV
MANCHESTER - HARTLAND TELEPHONE CO. (SAC 361426)	HARTLAND MANCHESTER (Full Study Area)	HRLDMNXH MNCHMNXM	WWC ETC Order JV
MANKATO CITIZENS TEL d/b/a HICKORYTECH (SAC 361427)	MANKATO (Full Study Area)	MNKTMNXM	WWC ETC Order IV
MID-COMMUNICATIONS, INC. DBA HICKORYTECH (SAC 361375)	AMBOY CAMBRIA EAGLE LAKE GOOD THUNDER GARDEN CITY LK CRYSTAL MADISON LAKE MAPLETON PEMBERTON ST CLAIR VERNON CENTER (Full Study Area)	AMBYMNXA CMBAMNXC EGLKMNXE GDTHMNXG GRCYMNXG LKCRMNXL MDSLMNXM MPTNMNXM PMTNMNXM PMTNMNXP STCLMNXS VRCTMNXV	WWCETC Order IV

Rural Telephone Company	Study Area/ Wire Center	CLEI Code	WWC Designation
MID-STATE TELEPHONE CO.* (SAC 361433)	NEW LONDON SUNBURG SPICER	NWLNMNXN SNBGMNXS SPCRMNXS	WWC ETC Order III WWC ETC Order III WWC ETC Order III
MID-STATE TEL CO. d/b/a KMP TELEPHONE CO. (SAC 361413)	DANUBE PENNOCK (Full Study Area when combined with existing RCC designation)	DANBMNXD PENCMNXP	WWC ETC Order III WWC ETC Order III
MINNESOTA LAKE TELEPHONE CO. (SAC 361437)	MINNESOTA LAKE (Full Study Area)	MNLKMNXM	WWCETC Order IV
MINNESOTA VALLEY TELEPHONE CO., INC. (SAC 361439)	FRANKLIN LUCAN MILROY (Full Study Area)	FKLNMNXF LUCNMNXL MLRYMNXM	WWCETC Order I
NEW ULM TELECOM, INC. (SAC 361442)	NEW ULM (Full Study Area)	NWULMNXN	WWCETC Order III
REDWOOD COUNTY TELEPHONE CO. (SAC 361472)	BELVEW ECHO MORGAN RED DEL RED DEL SEAFORTH VESTA WABASSO WOOD LAKE WALNUT GROVE (Full Study Area)	BLVWMNXB ECHOMNXE MRGNMNXM RDFLMNXF RDFLMNXR SFTHMNXS VESTMNXV WBSSMNXW WDLKMNXW WLGVMNXW	WWCETC Order I
SACRED HEART TELEPHONE CO. (SAC 361476)	SACRED HEART (Full Study Area)	SCHRMNXS	WWCETC Order I
SIOUX VALLEY TELEPHONE (SAC 391677)	VALLEY SPRINGS (Full Study Area)	VYSPSDXA	WWCETC Order1

Rural Telephone Company	Study Area/ Wire Center	CLLI Code	WWC Designation .
SLEEPY EYE TELEPHONE CO.* (SAC 361483)	HANSKA SLEEPY EYE	IINSKMNXII SLEYMNXS	WWC ETC Order III WWC ETC Order III
SPLITROCK TELECOM (SAC 391657)	GARRETSON (Full Study Area)	GRSNSDXA	WWCETC Order I
WESTERN TELEPHONE CO. (SAC 361 502)	SANBORN SPRINGFIELD (Full Study Area)	SNBRMNXS SPFDMNXS	WWCETC Order I
WINNEBAGO COOP. TELEPHONE ASSN. (SAC 361337)	SO EMMONS CONGER TWIN LAKES (Full Study Area)	EMMNMNXE CNGRMNXC TWLKMNXT	WWCETC Order IV
WINTHROP TELEPHONE CO. (SAC 361508)	WINTHROP (Full Study Area)	WNTHMNXW	WWC ETC Order I
WOODSTOCK TELEPHONE CO. (SAC 361510)	GARVIN HOLLAND RUSSELL RUTHTON WOODSTOCK (Full Study Area)	GRVNMNXG HLLDMNXH RSSLMNXA RTTNMNXR WDSTMNXW	WWC ETC Order I

^{* -} Denotes service area previously redefined from study area to wire center level. Minnesota Public Utilities Commission for Agreement to Redefine the Service Area of Frontier Communications of Minnesota, Inc., CC Docket 96-45, Public Notice, DA 00-2661 (rel. Nov. 29, 2000) (redefinition of Frontier Communications of Minnesota, Inc. deemed approved by FCC on Feb. 27, 2001); Western Wireless Corporation Petition for Agreement with Redefinition of Service Areas of Certain Rural Incumbent Local Exchange Carriers in the State of Minnesota Pursuant to 47 C.F.R. § 54.207(c), CC Docket No. 96-45 (Sept. 15, 2004), Public Notice, DA 04-3137 (rel. Sept. 29, 2004) (redefinition of CenturyTel of Minnesota, Inc., Embarq Minnesota f/k/a Sprint/United, Federated Telephone Corp., Mid-State Tel. Co. and Sleepy Eye Tel. Co. deemed approved by FCC on Dec. 28, 2004); Petition of the Minnesota Public Utilities Commission for Agreement with Changes in Definition of Service Areas of Twelve Minnesota Rural Telephone Companies, CC 96-45 (Aug. 7, 2003), Public Notice, DA 03-2641 (Aug. 12,2003) (redefinition of Citizens Telecom Co. MN and CenturyTel of Minnesota approved by FCC on March 17, 2005). (See In the Matter of Federal-State Joint Board on Universal Service, CC Docket 96-45, Report and Order, FCC 05-46, ¶ 76 n. 213 (rel. March 17,2005) ("March 2005 Order")).

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Company Service Area Requirement, "Order Granting Petition to Redefine Service Area Requirements to the Wire Center Level," MPUC Docket No. PT-6458/M-05-1122 (Dec. 18, 2006); American Cellular Corporation Petition for Agreement with Redefinition of the Service Areas of Certain Rural Incumbent Local Exchange Carriers in the State & Minnesota Pursuant to 47 C.F.R. § 54.207(c), CC-96-45, Public Notice, DA 07-18 (rel. Jan. 4,2007) (redefinition of Citizens Telecom Co. MN and Melrose Telephone expected to be approved by FCC on April 4,2007). In the event the FCC has not approved of the redefinition by April 4, 2007, RCC requests redefinition of the service area requirement based on the population density analysis.

EXHIBIT B

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FCC-MAILROOM

Rural Telephone Company Wire Centers for Which RCC is Requesting Reaffirmation of Its ETC Designation

Rural Telephone Company	Wire Center Name	CLM	RCC Designation
CITIZENS TELECOM CO MN -	ALBORN	ALBOMNXB	RCC Designation Order
FRONTIER CITIZENS COM-MN	ALVARADO	ALVDMNXA	RCC Designation Order
-LAKES**	ARGYLE	ARGYMNXB	RCC Designation Order
(SAC 361 123)	ASKOV	ASKVMNXA	RCC Designation Order
	AURORA	AURRMNXA	RCC Designation Order
	BABBITT	BBTTMNXB	RCC Designation Order
	BIG FALLS	BGFSMNXB	RCC Designation Order
	BROOKSTON	BKTNMNXB	RCC Designation Order
	BEAR RIVER	BRRVMNXB	RCC Designation Order
	BRIMSON	BRSNMNXB	RCC Designation Order
	CRANE LAKE	CNLKMNXB	RCC Designation Order
	CROMWELL	CRWLMNXC	RCC Designation Order
	DENHAM	DNHMMNXD	RCC Designation Order
	ELY	ELY MNXE	RCC Designation Order
	EMBARRASS	EMBFWNXE	RCC Designation Order
	ERICSBURG	ERBGMNXE	RCC Designation Order
	FLOODWOOD	FLWDMNXF	RCC Designation Order
	FINLAYSON	FNSNMNXF	RCC Designation Order
	GREANEY	GRNYMNXG	RCC Designation Order
	GARRISON	GRSNMNXG	RCC Designation Order
	GATEWAY	GTWYMNXG	RCC Designation Order
	HALLOCK	HLCKMNXH	RCC Designation Order
	HERMAN	HRMNMNXA	RCC Designation Order
	HOYT LAKES	HYLKMNXH	RCC Designation Order
	INTNTL FLS	INFLMNXI	RCC Designation Order
	ISABELLA	ISBLMNXI	RCC Designation Order
	ISLE	ISLEMNXI	RCC Designation Order
	JACOBSON	JCBSMNXJ	RCC Designation Order
	KABETOGAMA	KBTGMNXN	RCC Designation Order
	KIMBERLY	KMBRMNXK	RCC Designation Order
	KENNEDY	KNDYMNXA	RCC Designation Order
	KETTLE RIV	KTRVMNXK	RCC Designation Order
	LITTLEFORK	LTFKMNXL	RCC Designation Order
	MALMO	MALMMNXM	RCC Designation Order
	MCGREGOR	MCGRMNXM	RCC Designation Order
	MEADOWLDS	MDLDMNXA	RCC Designation Order
	MCGRATH	MGRTMNXM	RCC Designation Order
	MILACA	MILCMNXM	RCC Designation Order
	NICKERSON	NCSNM"	RCC Designation Order
	ONAMIA	ONAMMNXO	RCC Designation Order
	OSLO	OSLOMNXO	RCC Designation Order

Rural Telephone Company	Wire Center Name	CLLI	RCC Designation
	PALO	PALOMNYP	RCC Designation Order
	PEASE	PEASMNXP	RCC Designation Order
	PALISADE	PLSDMNXP	RCC Designation Order
	RANIER	RANRMNXR	RCC Designation Order
	STURGEON L/	SGLKMNXS	RCC Designation Order
	STEPHEN	STPHMNXS	RCC Designation Order
	TOWER	TOWRMNXA	RCC Designation Order
	TWO HARBOR	TWHRMNXA	RCC Designation Order
	WARBA	WARBMNXA	RCC Designation Order
	WAHKON	WHKNMNXW	RCC Designation Order
	WHEATON	WHTNMNXW	RCC Designation Order
	WRIGHT	WRGHMNXW	RCC Designation Order
	WARREN	WRRNMNXW	RCC Designation Order
EMBARQ MINNESOTA*	ALEXANDRIA	ALXNMNXA	RCC Designation Order
SAC 361456)	ALEXANDRIA	ALXNMNXA	RCC Designation Order
,	AITKIN	ATKNMNXA	RCC Designation Order
	BENSON	BNSNMNXB	RCC Designation Order
	BENNETTVL	BNVLMNXB	RCC Designation Order
	BROWERVL	BOVLMNXB	RCC Designation Order
	CARLOS	CARLMNXC	RCC Designation Order
	CROSBY	CRSBMNXC	RCC Designation Order
	DEERWOOD	DRWDMNXD	RCC Designation Order
	HOLMESCITY	HMCYMNXH	RCC Designation Order
	LONG PRAR	LNPRMNXL	RCC Designation Order
	VILLARD	VLRDMNXV	RCC Designation Order
PEDERATED TELEPHONE	CHOKIO	CHOKMNXC	RCC Designation Order
COOPERATIVE	CORRELL	CRRLMNXA	RCC Designation Order
SAC 361390)	DANVERS	DNVSMNXD	RCC Designation Order
(5710 501570)	HOLLOWAY	HLWYMNXA	RCC Designation Order
	ODESSA	ODSSMNXO	RCC Designation Order
	(Full Study Area	ODSSWINAO	KCC Designation Order
	when combined		
	RCC acquired as		
	1.cc acquired as		
MELROSE TELEPHONE CO.** SAC 361430	Grey Eagle	GRYEMNXG	RCC Designation Order
MID-STATE TELEPHONE CO.'	SEDAN	SEDNMNXS	RCC Designation Order-
SAC 361433)	TERRACE	TRRCMNXT	RCC Designation Order

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** -Denotes service area previously redefined from study area to wire center level by Commission with FCC concurrence pending. See In the Matter of American Cellular Corporation's Petition for Designation as an Eligible Telecommunications Carrier and Redefinition of Rural Telephone Company Service Area Requirement, "Order Granting Petition to Redefine Service Area Requirements to the Wire Center Level," MPUC Docket No. PT-6458/M-05-1122 (Dec. 18, 2006); American Cellular Corporation Petition for Agreement with Redefinition & the Service Areas of Certain Rural Incumbent Local Exchange Carriers in the State of Minnesota Pursuant to 47 C.F.R. § 54.207(c), CC-96-45, Public Notice, DA 07-18 (rel. Jan. 4, 2007) (redefinition of Citizens Telecom Co. MN and Melrose Telephone expected to be approved by FCC on April 4,2007). In the event the FCC has not approved of the redefinition by April 4, 2007, RCC requests redefinition of the service area requirement based on the population density analysis.